

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

IN RE: )  
Jason Robert Guadalupe, Sr. ) CASE NO. 10-30093-DOT  
Renee Guadalupe )  
Debtor(s) ) CHAPTER 13

Beneficial Financial I Inc. Plaintiff  
Vs

Jason Robert Guadalupe, Sr.  
Renee Guadalupe Debtor(s)

## RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

Now comes the Debtor(s) in this matter, by counsel, and as and for Debtor(s) Response to the PLAINTIFF's Motion for Relief from Automatic Stay filed on 8/22/2013, says as follows:

1. The Debtors' have brought the account current inclusive of attorney's fees and costs.

WHEREFORE, Debtor(s) respectfully move the Court that the Motion be denied.

Respectfully submitted:

Jason Robert Guadalupe, Sr.  
Renee Guadalupe  
BY: /s/ Linda D. Jennings  
Counsel

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Certificate of Service

I certify that on September 16, 2013, I sent a true copy of the foregoing Answer by ECF transmittal, first class mail, postage prepaid, via e-mail or fax to the following parties:

Abby K. Moynihan, Esquire  
By ECF Transmission

Robert E. Hyman  
By ECF Transmission

/s/ Linda D. Jennings  
Linda D. Jennings